

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DENYONNA N. REED	§	CIVIL ACTION
	§	
Plaintiff,	§	
	§	
V.	§	COMPLAINT 5:22-cv-00068
	§	
I.Q. DATA INTERNATIONAL, INC.	§	
	§	
Defendant.	§	

JOINT MOTION TO EXTEND DEADLINE TO COMPLETE MEDIATION

Plaintiff DENYONNA REED and Defendant I.Q. DATA INTERNATIONAL, INC. jointly move this Court for an Order allowing the parties to extend the deadline to complete mediation, and state as follows:

1. On June 6, 2022, this Court entered its Scheduling Order [Dkt. No. 17], ordering the parties complete discovery by September 9, 2022, and to mediate on or before September 30, 2022.
2. Due to scheduling conflicts, the parties agreed to extend the discovery deadline¹ and Plaintiff's deposition is currently scheduled for October 21, 2022.
3. Due to additional conflicts, the parties respectfully request that the deadline to complete mediation be extended to December 9, 2022. This would also allow the parties to mediate after Plaintiff's deposition.
4. The requested extension is not for purposes of delay. Good cause exists for the extension and no party will be prejudiced by the requested extension.

¹ The Scheduling Order [Dkt. No. 17] permits the parties to continue discovery beyond the deadline by agreement.

WHEREFORE, the Parties request this Court to enter an order allowing the Parties to conduct mediation by December 9, 2022.

Dated: September 14, 2022

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I today caused a copy of the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system which will be sent to all attorneys of record.

/s/ Lee H. Staley
Lee H. Staley